

1 SANG N. DANG (NO. 214558)
sangdang@orionlawgroup.net
2 ORION LAW GROUP,
A PROFESSIONAL LAW CORPORATION
3 3 Hutton Centre Drive
Suite 850
4 Santa Ana, CA 92707
Telephone: 714-768-6800
5 Facsimile: 714-768-6850

6 Attorneys for Plaintiff
PLUSTEK INC.
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 PLUSTEK INC.,

13 Plaintiff,

14 vs.

15 SYSCAN, INC.,

16 Defendants.
17
18
19
20
21
22
23
24
25
26
27
28

CASE NO. C 07-05718 JL

**DECLARATION OF SANG N. DANG IN
SUPPORT OF PLAINTIFF'S MOTION TO
CONTINUE THE INITIAL CASE
MANAGEMENT CONFERENCE**

1
2 I, Sang N. Dang, declare as follows:

3 1. I have personal knowledge of the facts stated herein, except those stated on
4 information and belief and, if called upon, could and would testify competently to them. I am an
5 attorney of the Orion Law Group, A Professional Law Corporation ("OLG"), and I am counsel of
6 record for Plaintiff Plustek Inc.

7 2. The parties have engaged in three mediation sessions (on September 14 and
8 November 16, 2007, and on March 14, 2008 respectively) to discuss the settlement of a related
9 litigation (Case No. C07-01603 JW MED) pending in the San Jose Division of the Northern
10 District of California, as well as the settlement of the current litigation.

11 3. A true and correct copy of a Certification of ADR Session for a mediation
12 session that the parties attended on September 14, 2007 for the related litigation in the San Jose
13 Division is attached hereto as Exhibit A.

14 4. A true and correct copy of a Certification of ADR Session for a mediation
15 session that the parties attended on November 16, 2007 for the related litigation in the San Jose
16 Division is attached hereto as Exhibit B.

17 5. A true and correct copy of a Certification of ADR Session for a mediation
18 session that the parties attended on March 14, 2008 for the litigation in the San Jose Division is
19 attached hereto as Exhibit C. As reflected in this Certification, the parties have reached partial
20 agreement on settlement terms for the related litigation in the San Jose Division as well as for the
21 current litigation.

22 6. After the mediation session of March 14, 2008, the parties continued to
23 explore and discuss settlement terms. To date, the parties have agreed to the principle terms of
24 settlement for the current litigation as well as for the related litigation in the San Jose Division.
25 The parties are currently working together to prepare and finalize a settlement agreement.

26 7. A true and correct copy of email communications between the parties
27 regarding Plaintiff's Motion to Continue the Initial Case Management Conference is attached
28 hereto as Exhibit D. Per the email dated May 12, 2008, Defendant Syscan, Inc. would not oppose

1 Plaintiff's motion.
2

3 I declare under penalty of perjury of the laws of the United States that the
4 foregoing is true and correct. Executed on this 13th day of May, 2008 in Santa Ana California.
5

6
7 DATED: May 13, 2008

ORION LAW GROUP,
A PROFESSIONAL LAW CORPORATION

8
9 By _____ /s/ Sang N. Dang

10 Sang N. Dang
11 Attorneys for Plaintiff
12 PLUSTEK INC.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28